

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**IN RE: EX PARTE APPLICATION OF
LAURA ZUNIGA CACERES, BERTHA
ZUNIGA CACERES, AND SALVADOR
ZUNIGA CACERES FOR ASSISTANCE
BEFORE A FOREIGN TRIBUNAL**

CASE NO. 1:19MC405-LG-RHW

**NOTICE OF APPEARANCE AND REQUEST TO BE HEARD RE EX PARTE
APPLICATION OF LAURA ZUNIGA CACERES, BERTHA ZUNIGA CACERES, AND
SALVADOR ZUNIGA CACERES FOR DISCOVERY FOR USE IN A FOREIGN
TRIBUNAL PURSUANT TO 28 U.S.C. § 1782**

Randy Papetti, Jared Sutton, and Jennifer Lee-Cota of the law firm of Lewis Roca Rothgerber Christie LLP, along with local counsel, B. Wayne Williams and Norma Carr Ruff of the law firm of WEBB SANDERS & WILLIAMS, PLLC, represent Tanya Romero-Baca, Roberto David Castillo Mejia's wife, whose rights and interests are directly affected by the ex parte application seeking document discovery from Hancock Whitney Bank for use in a foreign tribunal pursuant to 28 U.S.C. § 1782 (the "Application"). [Docs. 1, 2] Undersigned counsel hereby enters their appearance in this case. Mr. Papetti, Mr. Sutton, and Ms. Lee-Cota are submitting their pro hac vice application pursuant to L. U. Civ. R 83.1(d) and will enter a formal appearance when the applications have been granted by the Court.

Counsel only learned about the ex parte Application from an inquiry by an investigative journalist after the notice and supporting memorandum [Docs. 1, 2] were filed. Counsel requests an opportunity to be heard on the Application seeking discovery from Hancock Whitney Bank and respectfully request 14 days from the filing of this notice to file a response to the Application.

RESPECTFULLY SUBMITTED, this the 5th day of August, 2019.

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CERTIFICATE OF SERVICE

I, B. Wayne Williams, one of the attorneys for Tanya Romero-Baca, do hereby certify that I have this date filed the above and foregoing *Notice of Appearance and Request to be Heard Re Ex Parte Application of Laura Zuniga Caceres, Bertha Zuniga Caceres, and Salvador Zuniga Caceres For Discovery For Use In A Foreign Tribunal Pursuant to 28 U.S.C. § 1782* using the Court's electronic filing system which in turn served a true and correct copy of the same to counsel of record as follows:

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This the 5th day of August 2019.

/s/ B. Wayne Williams
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